



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

7011-1150-0000-2642-6682

October 8, 2015

Douglas McWilliams  
Squire, Sanders & Dempsey, L.L.P.  
4900 Key Tower  
127 Public Square  
Cleveland, Ohio 44114

Re: Chemical Recovery System, Inc., OH Site ID 0521  
Bill Number 2751626S0001 \$46,579.22

Dear Mr. McWilliams:

The U.S. Environmental Protection Agency (EPA) under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended, 42 U.S.C 9601 et seq., is seeking to recover costs paid by EPA for activities undertaken at the Chemical Recovery System, Inc., OH (the Site). This billing is transmitted pursuant to the reimbursement provisions set forth in the United States v. A.K. Steel Corporation., et.al Consent Decree, 1:10 CV 00996 and is solely for the for the recovery of EPA's response costs. Any fines and/or penalties due will be billed separately.

Enclosed is the accounting of the costs for the Site for the period July 17, 2014 through July 16, 2015, reflecting the amount of \$46,579.22. This amount is due to be paid within 30 days of receipt of this bill, pursuant to the terms of the settlement agreement.

If payment is not received within that time frame, interest will accrue on any unpaid amounts from the date of your receipt. The current interest rate is 0.67%. Please review and adhere to all procedures and requirements, as specified in the settlement agreement, for making payment and for disputing all or part of the costs invoiced. If you intend to dispute any of the costs, please follow as required by Section XIX, Dispute Resolution.

Failure to comply with these requirements may subject the respondent to stipulated penalties. Non-compliance may also result in further collections efforts, including referring the debt to the Department of Justice (DOJ).

Please make your check payable to the EPA Hazardous Substance Superfund and send to:

US Environmental Protection Agency  
Superfund Payments  
Cincinnati Finance Center  
P.O. Box 979076  
St. Louis, MO 63197-9000

In order for EPA to accurately record receipt of your payment, you are advised to include the following information on your remittance:

- Chemical Recovery System, OH
- Site ID 0521
- Bill Number 2751626S0001

If you have any questions regarding the billed costs or other legal matters concerning the Site, the following individual in EPA's Office of Regional Counsel may be contacted:

Thomas Nash, Associate Regional Counsel  
U.S. Environmental Protection Agency  
77 West Jackson Blvd - C-14J  
Chicago, Illinois 60604  
312 886-0552  
[nash.thomas@epa.gov](mailto:nash.thomas@epa.gov)

If you have any questions regarding Site work activities, the following individual may be contacted:

Jennifer Elkins, Regional Project Manager  
U.S. Environmental Protection Agency  
77 West Jackson Blvd - SR-6J  
Chicago, Illinois 60604  
312 353-4627  
[elkins.jennifer@epa.gov](mailto:elkins.jennifer@epa.gov)

Please send notification of payment to Mr. Nash and Mrs. Elkins.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard D. Hackley".

Richard D. Hackley, Chief  
Program Accounting & Analysis Section

Enclosures

cc: Thomas Nash, C-14J  
Jennifer Elkins, SR-6J

US EPA - Lori Weidner, Cincinnati Finance Center

## Itemized Cost Summary

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

REGIONAL PAYROLL COSTS .....	\$18,503.30
HEADQUARTERS PAYROLL COSTS .....	\$249.15
REGIONAL TRAVEL COSTS .....	\$1,413.00
INTERAGENCY AGREEMENT (IAG)	
DEPARTMENT OF JUSTICE (DOJ/OVERSIG) .....	\$493.73
SUPERFUND COOPERATIVE AGREEMENT (SCA)	
OHIO E.P.A. (V00E01185) .....	\$3,849.82
OHIO ENVIRONMENTAL PROTECTION AGENCY (V01E01185) .....	\$1,331.89
TECHNICAL SERVICE AND SUPPORT	
PRIMUS SOLUTIONS, INC. (EPW11024) .....	\$442.39
EPA INDIRECT COSTS .....	\$20,295.94
Total Site Costs:	<u>\$46,579.22</u>

## Regional Payroll Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
BARNES, SHEILA FINANCIAL SPECIALIST	2014	22	0.50	24.95
		24	2.00	99.84
		26	2.50	124.80
		27	0.50	24.96
	2015	01	0.00	0.00
		02	0.50	24.96
		03	1.50	76.86
		06	0.50	25.62
			<u>8.00</u>	<u>\$401.99</u>
ELKINS, JENNIFER Environmental Engineer	2014	23	1.00	58.30
		24	2.00	116.61
		25	2.00	116.61
		26	1.00	58.30
		27	7.50	437.25
	2015	03	5.00	294.41
		06	15.50	912.69
		10	8.00	499.83
		11	10.00	624.79
		12	3.00	187.42
		13	2.00	124.96
		14	8.00	499.83
			<u>65.00</u>	<u>\$3,931.00</u>
FISCHER, TIMOTHY ENVIRONMENTAL ENGINEER	2014	27	4.50	348.45
	2015	01	0.50	38.72
		03	1.50	120.01
		06	11.50	919.43
		08	0.25	20.01
		09	3.25	262.85
		11	1.00	80.88
		13	0.50	40.44
		14	3.50	283.07
		15	0.50	40.44
		16	1.00	80.88
		18	3.43	268.54

## Regional Payroll Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
FISCHER, TIMOTHY	2015	19	2.00	161.76
			33.43	\$2,665.48
HAILE, LINDA LEAD ACCOUNTANT	2015	03	0.25	16.78
			0.25	\$16.78
KYTE, LAWRENCE SUPERVISORY GENERAL ATTORNEY	2015	07	0.75	65.38
			0.75	\$65.38
NASH, THOMAS GENERAL ATTORNEY	2014	23	1.50	132.43
		25	2.50	220.71
		27	3.75	331.06
	2015	02	0.50	44.58
		04	3.00	258.96
		06	8.50	724.21
		07	6.00	534.90
		08	4.25	378.88
		11	7.25	653.99
		12	3.25	293.15
		13	1.00	90.20
		14	2.00	180.42
		15	3.00	270.60
			46.50	\$4,114.09
TANAKA, JOAN ENVIRONMENTAL ENGINEER	2015	14	0.50	48.03
			0.50	\$48.03
WILSON, DAVID ENVIRONMENTAL SCIENTIST	2015	08	8.25	628.89
		09	55.00	4,241.18
		16	31.00	2,390.48
			94.25	\$7,260.55
Total Regional Payroll Costs			248.68	\$18,503.30

## Headquarters Payroll Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
GERVAIS, GREGORY P.	2015	02	1.75	160.23
STUDENT TRAINEE (ENGINEERING)		03	1.00	88.92
			<u>2.75</u>	<u>\$249.15</u>
Total Headquarters Payroll Costs			<u>2.75</u>	<u>\$249.15</u>

## Regional Travel Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>
ELKINS, JENNIFER	TAA005RD	AVC150013	10/20/2014	22.05
Environmental Engineer	TAA005RD	AMP150013	10/20/2014	5.00
	TAA00GPR	AVC150071	01/09/2015	549.76
	TAA00GPR	AMP150068	01/09/2015	84.00
				<hr/> \$660.81
FISCHER, TIMOTHY	TAA007V9	AVC150013	10/20/2014	22.05
ENVIRONMENTAL ENGINEER	TAA007V9	AMP150013	10/20/2014	30.40
	TAA00LHV	AMP150066	01/07/2015	49.69
	TAA00LHV	AVC150069	01/07/2015	650.05
				<hr/> \$752.19
Total Regional Travel Costs				<hr/> <hr/> \$1,413.00



## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

INTERAGENCY AGREEMENT (IAG)

Federal Agency: DEPARTMENT OF JUSTICE

IAG Number: DOJ/OVERSIG

Project Officer(s):

Dates of Service: From: To:

Summary of Service:

Total Costs: \$493.73

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
9011309505 FY 2015	08/20/2015	493.73	N/A 08/20/2015	493.73
			Total:	<u>\$493.73</u>

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

SUPERFUND COOPERATIVE AGREEMENT (SCA)

State Agency: OHIO E.P.A.

SCA Number: V00E01185

Project Officer(s): Glynis Ivy

Dates of Service: From: To:

Summary of Service:

Total Costs: \$3,849.82

Drawdown Number	Drawdown Date	Drawdown Amount	Treasury Schedule Number and Date	Site Amount
311334820C	07/23/2014	16,908.24	42043997341 07/23/2014	70.45
311334820C	08/19/2014	11,209.63	42313997341 08/19/2014	195.58
311334820C	09/04/2014	22,525.48	42473997341 09/04/2014	343.09
311334820C	09/16/2014	7,058.75	42593997341 09/16/2014	365.65
311334820C	09/30/2014	9,344.34	42733997341 09/30/2014	156.67
311334820C	10/24/2014	15,179.32	52973997341 10/24/2014	117.87
311334820C	11/12/2014	9,283.20	53163997341 11/12/2014	147.41
311334820C	11/26/2014	11,409.19	53303997341 11/26/2014	61.53
311334820C	12/24/2014	6,219.52	53583997341 12/24/2014	109.26
311334820C	01/15/2015	8,956.11	50153997341 01/15/2015	380.23
311334820C	01/22/2015	7,529.86	50223997341 01/22/2015	545.32
311334820C	01/30/2015	5,590.55	50303997341 01/30/2015	206.87
311334820C	02/20/2015	6,979.29	50513997341 02/20/2015	65.44
311334820C	03/04/2015	6,402.99	50633997341 03/04/2015	106.23
311334820C	03/18/2015	9,216.87	50773997341 03/18/2015	403.63
311334820C	04/01/2015	9,766.57	50913997341 04/01/2015	78.31
311334820C	04/14/2015	7,379.80	51043997341 04/14/2015	496.28
Total:				<u>\$3,849.82</u>

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

SUPERFUND COOPERATIVE AGREEMENT (SCA)

State Agency: OHIO ENVIRONMENTAL PROTECTION AGENCY

SCA Number: V01E01185

Project Officer(s): Glynis Landers

Dates of Service: From: To:

Summary of Service:

Total Costs: \$1,331.89

<u>Drawdown Number</u>	<u>Drawdown Date</u>	<u>Drawdown Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
311334820C	05/22/2015	9,155.53	51423997341 05/22/2015	70.36
311334820C	06/02/2015	16,615.68	51533997341 06/02/2015	138.92
311334820C	06/18/2015	10,886.27	51693997341 06/18/2015	430.87
311334820C	06/30/2015	23,688.28	51813997341 06/30/2015	691.74
Total:				<u>\$1,331.89</u>

## Contract Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

TECHNICAL SERVICE AND SUPPORT

Contractor Name: PRIMUS SOLUTIONS, INC.  
 EPA Contract Number: EPW11024  
 Delivery Order Information    DO #            Start Date            End Date  
    19                05/26/2014            05/31/2015  
 Project Officer(s): CALVIN, LYNN  
                                  RZEZNIK, ANNA  
 Dates of Service:            From:                            To:  
 Summary of Service: TECHNICAL SERVICES AND SUPPORT  
 Total Costs:                            \$442.39

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
22	07/17/2014	87,562.57	AVC140277      08/14/2014	21.46
25	10/23/2014	69,475.53	AVC150034      11/17/2014	71.22
31	03/12/2015	88,193.79	AVC150134      04/10/2015	79.12
32	04/09/2015	115,210.71	AVC150154      05/08/2015	60.03
33	05/11/2015	90,981.41	AVC150179      06/15/2015	112.80
34	06/11/2015	105,658.08	AVC150194      07/03/2015	97.76
Total:				<u>\$442.39</u>

## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate( %)</u>	<u>Indirect Costs</u>
2014	3,247.17	77.22%	2,507.45
2015	23,036.11	77.22%	17,788.49
	<u>26,283.28</u>		
Total EPA Indirect Costs			<u>\$20,295.94</u>

EPA Indirect Costs  
 CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
 COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
BARNES, SHEILA	2014	22	24.95	77.22%	19.27
		24	99.84	77.22%	77.10
		26	124.80	77.22%	96.37
		27	24.96	77.22%	19.27
			<u>274.55</u>		<u>\$212.01</u>
ELKINS, JENNIFER	2014	23	58.30	77.22%	45.02
		24	116.61	77.22%	90.05
		25	116.61	77.22%	90.05
		26	58.30	77.22%	45.02
		27	437.25	77.22%	337.64
			<u>787.07</u>		<u>\$607.78</u>
FISCHER, TIMOTHY	2014	27	348.45	77.22%	269.07
			<u>348.45</u>		<u>\$269.07</u>
NASH, THOMAS	2014	23	132.43	77.22%	102.26
		25	220.71	77.22%	170.43
		27	331.06	77.22%	255.64
			<u>684.20</u>		<u>\$528.33</u>
Total Fiscal Year 2014 Payroll Direct Costs:			<u>2,094.27</u>		<u>\$1,617.19</u>

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPW11024	22	08/14/2014	21.46	0.00	77.22%	16.57
			<u>21.46</u>	<u>0.00</u>		<u>\$16.57</u>

## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21

COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
V00E01185	311334820C	07/23/2014	70.45	0.00	77.22%	54.40
		08/19/2014	195.58	0.00	77.22%	151.03
		09/04/2014	343.09	0.00	77.22%	264.93
		09/16/2014	365.65	0.00	77.22%	282.35
		09/30/2014	156.67	0.00	77.22%	120.98
			1,131.44	0.00		\$873.69

Total Fiscal Year 2014 Other Direct Costs:	1,152.90	0.00	\$890.26
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Total Fiscal Year 2014:	3,247.17		\$2,507.45
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PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
BARNES, SHEILA	2015	01	0.00	77.22%	0.00
		02	24.96	77.22%	19.27
		03	76.86	77.22%	59.35
		06	25.62	77.22%	19.78
			127.44		\$98.40
ELKINS, JENNIFER	2015	03	294.41	77.22%	227.34
		06	912.69	77.22%	704.78
		10	499.83	77.22%	385.97
		11	624.79	77.22%	482.46
		12	187.42	77.22%	144.73
		13	124.96	77.22%	96.49
		14	499.83	77.22%	385.97
			3,143.93		\$2,427.74
FISCHER, TIMOTHY	2015	01	38.72	77.22%	29.90
		03	120.01	77.22%	92.67

EPA Indirect Costs  
 CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
 COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
FISCHER, TIMOTHY	2015	06	919.43	77.22%	709.98
		08	20.01	77.22%	15.45
		09	262.85	77.22%	202.97
		11	80.88	77.22%	62.46
		13	40.44	77.22%	31.23
		14	283.07	77.22%	218.59
		15	40.44	77.22%	31.23
		16	80.88	77.22%	62.46
		18	268.54	77.22%	207.37
		19	161.76	77.22%	124.91
			<u>2,317.03</u>		<u>\$1,789.22</u>
GERVAIS, GREGORY P.	2015	02	160.23	77.22%	123.73
		03	88.92	77.22%	68.66
			<u>249.15</u>		<u>\$192.39</u>
HAILE, LINDA	2015	03	16.78	77.22%	12.96
			<u>16.78</u>		<u>\$12.96</u>
KYTE, LAWRENCE	2015	07	65.38	77.22%	50.49
			<u>65.38</u>		<u>\$50.49</u>
NASH, THOMAS	2015	02	44.58	77.22%	34.42
		04	258.96	77.22%	199.97
		06	724.21	77.22%	559.23
		07	534.90	77.22%	413.05
		08	378.88	77.22%	292.57
		11	428.48	77.22%	330.87
			225.51	77.22%	174.14
		12	293.15	77.22%	226.37
		13	90.20	77.22%	69.65
		14	180.42	77.22%	139.32



## EPA Indirect Costs

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
NASH, THOMAS	2015	15	270.60	77.22%	208.96
			3,429.89		\$2,648.55
TANAKA, JOAN	2015	14	48.03	77.22%	37.09
			48.03		\$37.09
WILSON, DAVID	2015	03	628.89	77.22%	485.63
		09	4,241.18	77.22%	3,275.04
		16	2,390.48	77.22%	1,845.93
			7,260.55		\$5,606.60
Total Fiscal Year 2015 Payroll Direct Costs:			16,658.18		\$12,863.44

TRAVEL DIRECT COSTS

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
ELKINS, JENNIFER	TAA005RD	10/20/2014	22.05	77.22%	17.03
			5.00	77.22%	3.86
	TAA00GPR	01/09/2015	84.00	77.22%	64.86
			549.76	77.22%	424.52
			660.81		\$510.27
FISCHER, TIMOTHY	TAA007V9	10/20/2014	30.40	77.22%	23.48
			22.05	77.22%	17.03
	TAA00LHV	01/07/2015	650.05	77.22%	501.97
			49.69	77.22%	38.38
			752.19		\$580.86
Total Fiscal Year 2015 Travel Direct Costs:			1,413.00		\$1,091.13

EPA Indirect Costs  
 CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
 COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
DOJ/OVERSIG	9011309505 FY 2015	08/20/2015	493.73	0.00	77.22%	381.26
			493.73	0.00		\$381.26
EPW11024	25	11/17/2014	71.22	0.00	77.22%	55.00
	31	04/10/2015	79.12	0.00	77.22%	61.10
	32	05/08/2015	60.03	0.00	77.22%	46.36
	33	06/15/2015	112.80	0.00	77.22%	87.10
	34	07/03/2015	97.76	0.00	77.22%	75.49
			420.93	0.00		\$325.05
V00E01185	311334820C	10/24/2014	117.87	0.00	77.22%	91.02
		11/12/2014	147.41	0.00	77.22%	113.83
		11/26/2014	61.53	0.00	77.22%	47.51
		12/24/2014	109.26	0.00	77.22%	84.37
		01/15/2015	380.23	0.00	77.22%	293.61
		01/22/2015	545.32	0.00	77.22%	421.10
		01/30/2015	206.87	0.00	77.22%	159.75
		02/20/2015	65.44	0.00	77.22%	50.53
		03/04/2015	106.23	0.00	77.22%	82.03
		03/18/2015	403.63	0.00	77.22%	311.68
		04/01/2015	78.31	0.00	77.22%	60.47
		04/14/2015	496.28	0.00	77.22%	383.23
			2,718.38	0.00		\$2,099.13
V01E01185	311334820C	05/22/2015	70.36	0.00	77.22%	54.33
		06/02/2015	138.92	0.00	77.22%	107.27
		06/18/2015	430.87	0.00	77.22%	332.72

CHEMICAL RECOVERY, OH, OH SITE ID = 05 21  
COSTS FROM JULY 17, 2014 THROUGH JULY 16, 2015

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
V01E01185	311334820C	06/30/2015	691.74	0.00	77.22%	534.16
			1,331.89	0.00		\$1,028.48
Total Fiscal Year 2015 Other Direct Costs:			4,964.93	0.00		\$3,833.92
Total Fiscal Year 2015:			23,036.11			\$17,788.49
Total EPA Indirect Costs						\$20,295.94

